

U.S. Department of Justice

Washington, DC 20530

**Registration Statement****Pursuant to the Foreign Agents Registration Act of  
1938, as amended****I--REGISTRANT****1. Name of Registrant**

Brown Rudnick LLP

**2. Registration Number (To be assigned by the FARA Unit)**

7210

**3. Primary Business Address**

One Financial Center, 18th Floor, Boston, MA 02111

**4. If the registrant is an individual, furnish the following information:**

(a) Residence address(es)

(b) Nationality

(c) Year of birth

(d) Present citizenship

(e) If present citizenship not acquired by birth, state when, where and how acquired

(f) Occupation

**5. If the registrant is not an individual, furnish the following information:**(a) Type of organization: Committee ☐ Association ☐ Partnership ☐ Voluntary group ☐  
Corporation ☐ Other (*specify*) Limited Liability Partnership

(b) Date and place of organization 02/01/2002, Massachusetts

(c) Name of responsible individual Vincent J. Guglielmotti  
(e.g., officer, director or partner)(d) Other business address(es), if any, including See Appendix for Response  
locations of branch or local offices

(e) If a membership organization, provide number of members

(f) List all partners, officers, directors or persons performing the functions of an officer or director of the registrant.

Name	Residence Address	Citizenship	Position
William R. Baldiga	51 Grove Street Hopkinton, MA 01748	UNITED STATES	Income Partner
Stephen A. Best	3810 Bradley Lane Chevy Chase, MD 20815	UNITED STATES	Equity Partner
Clara Krivoy	17 Gramatan Court Bronxville, NY 10708	UNITED STATES	Equity Partner
Julia V. Bennett	2806 Sunset Lane Suitland, MD 20746	UNITED STATES	Chief Marketing Officer

See Appendix for  
Additional Names

(g) Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?

Name	Foreign Principal(s)	Services
See Appendix for Response		

(h) Describe the nature of the registrant's regular business or activity.

Brown Rudnick LLP is a law firm.

(i) Give a complete description of the ownership and control structure of the registrant.

Brown Rudnick LLP is a limited liability partnership, owned and controlled by its partners.

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6. List all individuals, other than those listed in Item 5(g), who render services or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical, secretarial, or in a related or similar capacity.

Name	Residence Address	Foreign Principal(s)	Services
See Appendix for Response			

**II--FOREIGN PRINCIPAL**

7. List every foreign principal<sup>1</sup> for whom the registrant is acting or has agreed to act.

**Foreign Principal**

Commonwealth/Government of The Bahamas

**Foreign Principal Address**

Paul K. Adderley Bldg, No. 18 John F. Kennedy Dr,  
P.O. Box. N-3007  
Nassau, N.P.  
BAHAMAS

**III--ACTIVITIES**

8. In addition to the activities described in any Exhibit B to this statement, will the registrant engage or is the registrant engaging now in activity or rendering services on its own behalf which benefits any or all of its foreign principals?

Yes ☐No ☒

If yes, describe fully.

**Foreign Principal****Activities/Services****IV--FINANCIAL INFORMATION****9. (a) RECEIPTS-MONIES**

During the period beginning 60 days prior to the date of the registrant's obligation to register<sup>2</sup> under FARA, has the registrant received from any foreign principal named in Item 7 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income, or money either as compensation, or for disbursement or otherwise?

Yes ☐No ☒

If yes, set forth below in the required detail and separately for each such foreign principal an account of such monies.<sup>3</sup>

Foreign Principal	Date Received	From Whom	Purpose	Amount	Subtotal
Commonwealth/Government of The Bahamas			Nothing Received		

\$ .00

Total

<sup>1</sup> The term "foreign principal," as defined in Section 1(b) of the Act, includes a foreign government, foreign political party, foreign organization, foreign individual and, for the purpose of registration, an organization or an individual any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual.

<sup>2</sup> An agent must register within 10 days of becoming an agent, and before acting as such.

<sup>3</sup> A registrant is required to file an Exhibit D if he collects or receives contributions, loans, monies, or other things of value for a foreign principal, as part of a fundraising campaign. There is no printed form for this exhibit. (See Rule 201(e), 28 C.F.R. § 5.201(e)).

**(b) RECEIPTS-THINGS OF VALUE**

During the period beginning 60 days prior to the date of the registrant's obligation to register<sup>4</sup> under FARA, has the registrant received anything of value<sup>5</sup> other than money, from any foreign principal named in Item 7 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐No ☒

If yes, furnish the following information:

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value
Commonwealth/Government of The Bahamas			Nothing Received	

**10. (a) DISBURSEMENTS-MONIES**

During the period beginning 60 days prior to the date of the registrant's obligation to register<sup>6</sup> under FARA, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Item 7 of this statement or transmitted monies to any such foreign principal?

Yes ☒No ☐

If yes, set forth below in the required detail and separately for each such foreign principal named including monies transmitted, if any, to each foreign principal.

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
See Appendix for Response					
				\$ 30,801.50	
					Total

**(b) DISBURSEMENTS-THINGS OF VALUE**

During the period beginning 60 days prior to the date of the registrant's obligation to register<sup>7</sup> under FARA, has the registrant disposed of any thing of value<sup>8</sup> other than money in furtherance of or in connection with its activities on behalf of any foreign principal named in Item 7 of this statement? Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
Commonwealth/Government of The Bahamas			Nothing Disbursed	

**(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During the period beginning 60 days prior to the date of the registrant's obligation to register<sup>9</sup> under FARA, has the registrant (or any short form registrant) made any contribution of money or other thing of value from its own funds and on its own behalf in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any political office? Yes ☒ No ☐

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
11/10/2022	Clara Krivoy	Senator Warnock	Online through ActBlue	\$ 300.00

4, 6, 7 and 9 See Footnote 2, on page 3.

5 and 8 Things of value include but are not limited to gifts, interest-free loans, expense-free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks", and the like.

**V--INFORMATIONAL MATERIALS<sup>10</sup>**

11. Prior to the time of filing this statement,<sup>11</sup> has the registrant prepared, disseminated, or caused to be disseminated, any informational materials on behalf of any foreign principal listed in Item 7 of this statement?

Yes ☐ No ☒

If yes, identify each foreign principal and file the informational materials.

Foreign Principal

Type of Informational Materials

12. (a) Will the activities of the registrant on behalf of any foreign principal include the preparation or dissemination of informational materials?

Yes ☒ No ☐

- (b) If yes, identify each foreign principal and respond to the remaining items in this section.

Commonwealth/Government of The Bahamas

13. Has a budget been established or specified sum of money allocated to finance the registrant's activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each foreign principal, and specify the period of time and the amount.

Foreign Principal

Period of Time

Amount

14. Will any individuals or organizations, including public relations firms or publicity agents, participate in the preparation or dissemination of such informational materials?

Yes ☐ No ☒

If yes, furnish the names and addresses of such individuals or organizations.

Name

Address

Foreign Principal(s)

15. Activities in preparing or disseminating informational materials will include the use of the following:

- ☒ Magazine or newspaper ☐ Advertising campaigns ☒ Press releases ☐ Pamphlets or other publications  
☒ Lectures or speeches ☐ Radio or TV broadcasts ☐ Motion picture films ☒ Letters or telegrams  
☒ Email  
☒ Website URL(s): brownrudnick.com  
☒ Social Media website URL(s): \_\_\_\_\_  
☒ Other (*specify*) To be determined

<sup>10</sup> The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, electronic communications, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

<sup>11</sup> See Footnote 2, on page 3.

16. Informational materials will be disseminated among the following groups:

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> Public officials    | <input type="checkbox"/> Civic groups or associations              |
| <input checked="" type="checkbox"/> Legislators         | <input type="checkbox"/> Libraries                                 |
| <input checked="" type="checkbox"/> Government agencies | <input checked="" type="checkbox"/> Educational groups             |
| <input checked="" type="checkbox"/> Newspapers          | <input type="checkbox"/> Nationality groups                        |
| <input checked="" type="checkbox"/> Editors             | <input checked="" type="checkbox"/> Other ( <i>specify</i> ) _____ |

17. Indicate the language to be used in the informational materials:

- ☒ English ☐ Other (*specify*) \_\_\_\_\_

## VI--EXHIBITS AND ATTACHMENTS

18. (a) The following described exhibits shall be filed with a Registration Statement:

*Exhibit A-* This exhibit, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal named in Item 6.

*Exhibit B-* This exhibit, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

(b) An Exhibit C shall be filed when applicable. This exhibit, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530. (See Rule 201(c) and (d)).

(c) An Exhibit D shall be filed when applicable. This exhibit, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal. (See Rule 201 (e)).

## VII--EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date	Printed Name	Signature <sup>12</sup>
12/23/2022	Clara Krivoy	/s/Clara Krivoy
_____	_____	_____
_____	_____	_____
_____	_____	_____

<sup>12</sup> This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

**EXECUTION**

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature

12/23/2022

Clara Krivoy

CLARA KRIVOVY



## **Appendix**

### **Response to Item 5(d)**

**Item 5(d): If the registrant is not an individual, furnish the following information: Other business address(es), if any, including locations of branch or local offices.**

185 Asylum Street, Hartford, CT 06103

2211 Michelson Drive, 7th Floor, Irvine, CA 92612

601 Thirteenth Street NW, Suite 600, Washington, DC 20005

7 Times Square, New York, NY 10036

10 Memorial Boulevard, Providence, RI 02903

8 Clifford Street, London, UNITED KINGDOM W1S 2LQ



**Appendix**  
**Response to Item 5(f) Attached**

**Item 5(f): If the registrant is not an individual, furnish the following information: List all partners, officers, directors or persons performing the functions of an officer or director of the registrant.**

List of Partners/Officers/Directors

**Brown Rudnick LLP - List of Partners & Officers**

<b>Name</b>	<b>Business City<sup>1</sup></b>	<b>Citizenship<sup>2</sup></b>	<b>Title</b>
Andromalos, Andreas P.	Boston	US	Partner
Asher, Kenneth R.	New York	US	Partner
Aulet, Kenneth	New York	US	Partner
Baldiga, William R.	Boston	US	Partner
Baldwin, Mark S.	Hartford	US	Partner
Bedar, James E.	Boston	US	Partner
Bedow, Rodney A.	Boston	US	Partner
Bennett, Julia V.	Washington, DC	US	Chief Marketing Officer
Best, Stephen A.	Washington, DC	US	Partner
Beville, Sunni P.	Boston	US	Partner
Bibby, Peter A.	London	UK	Partner
Bouchard, Nicole M.	New York	US	Partner
Bowe, Michael J.	New York	US	Partner
Bucci, Mary D.	Boston	US	Partner
Byrne, Preston	Washington, DC	US	Partner
Carty, Andrew M.	New York	US	Partner
Castaldi, Cathrine M.	Irvine	US	Partner
Charles, Jennifer I.	Boston	US	Partner
Chew, Benjamin G.	Washington, DC	US	Partner
Chijner, David	London	France & Israel	Partner
Cohen, Douglas A.	Hartford	US	Partner
Cohen, Michael J.	Boston	US	Partner
Colston, Jane M.	London	UK	Partner
Cook, Stephen R.	Irvine	US	Partner
Cottle, Jeffrey W.	Washington, DC	US	Partner
Darsigny, James M.	Boston	US	Chief Information Officer
Dennison, Wayne F.	Boston	US	Partner
DeRosa, Franca L.	Hartford	US	Partner
DiBernardo, Ian G.	New York	US	Partner
DiSpirito, Neil P.	Washington, DC	US	Partner
Dolan, Michael R.	Providence	US	Partner
Dorff, Mark A.	London	US	Partner
Douglass, James	London	UK & Australia	Partner
Dwoskin, Sharon I.	Boston	US	Partner
Emmerman, Todd J.	New York	US	Partner
Ferino, Joseph A.	New York	US	Partner

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<sup>1</sup> See prior response for business address in each city.

<sup>2</sup> Partners may have additional citizenships not included in this list.

<b>Name</b>	<b>Business City<sup>1</sup></b>	<b>Citizenship<sup>2</sup></b>	<b>Title</b>
Fiuza, Alejandro D.	Boston	US & Argentina	Partner
Flink, Philip J.	Boston	US	Partner
Foster, Neil	London	UK	Partner
Garcia, Adolfo R.	Boston	US	Partner
Gardner, Catherine B.	New York	US	Partner
Gilman, Edward P.	Washington, DC	US	Partner
Goodman, Eric R.	Washington, DC	US	Partner
Grider, Mark A.	Washington, DC	US	Partner
Guglielmotti, Vincent J.	New York	US	Partner
Hodge, Lena	London	UK	Partner
Hron, Benjamin M	Boston	US	Partner
Hunsicker, Emily Daughters	Boston	US	Chief Talent Officer
Hyde, Zachary D.	Boston	US	Partner
Johnson, Kyle R.	Hartford	US	Partner
Jonas, Jeffrey L.	New York	US	Partner
Joyce, Kevin P.	Boston	US	Partner
Keinan, Tuvi	London	UK	Partner
Klepper, Barbara F	Boston	US	Partner
Kletter, Dylan P.	Hartford	US	Partner
Korff, Jennifer Z.	New York	US	Chief Operating Officer
Krivoy, Clara	New York	US & Venezuela	Partner
Krzyzowski, Marek P.	New York	US	Partner
Lang, Aaron C.	New York	US	Partner
Lecaroz, Rebecca M.	Boston	US	Partner
Lennon, Hailey	Irvine	US	Partner
Levine, Steven B.	Boston	US	Partner
Levy, Fred L.	Washington, DC	US	Partner
Marcus, Linda B.	New York	US	Partner
Meyers, Thomas C.	Boston	US	Partner
Micklethwaite, Neil P.	London	UK	Partner
Miliband, Joel S.	Irvine	US	Partner
Molton, David J.	New York	US	Partner
Moxley, D. Cameron	New York	US	Partner
Mullarney, Chelsea E.	New York	US	Partner
Naughton, Edward J.	Boston	US	Partner
Palley, Stephen D.	Washington, DC	US	Partner
Papalaskaris, Angela M.	New York	US	Partner
Pare, Edward D.	Prov	US	Partner
Phillips, Thomas J.	Boston	US	Partner
Pohl, Steven D.	Boston	US	Partner
Presiado, Leo J.	Irvine	US	Partner
Regan, Thomas J.	Hartford	US	Partner

<b>Name</b>	<b>Business City<sup>1</sup></b>	<b>Citizenship<sup>2</sup></b>	<b>Title</b>
Rey, Elena Sabinina	London	UK	Partner
Richardson, Matthew	Washington, DC	US	Partner
Ritter, Thomas D.	Hartford	US	Partner
Rus, Ronald	Irvine	US	Partner
Schoen, Adam M.	Boston	US	Partner
Shrimpton, Neill	London	UK & Ireland	Partner
Silverberg, Bennett S.	New York	US	Partner
Sivakumar, Arjun	Irvine	US	Partner
Small, Philip M.	Hartford	US	Partner
Smedresman, Scott M	New York	US	Partner
Smith, Randall A.	Irvine	US	Partner
Sobel, Jason M.	New York	US	Partner
Sorin, David J	New York	US	Partner
Sorin, Jared M	New York	US	Partner
Stark, Robert J.	New York	US	Partner
Stein, David M.	Irvine	US	Partner
Stoll, James W.	Boston	US	Partner
Strehle, Andrew P.	Boston	US	Partner
Tabaksblat, Lauren	New York	US	Partner
Tosti, Robert J.	Boston	US	Partner
Uretsky, Matthew E	New York	US	Partner
Varella, Amanda B.	Boston	US	Partner
Vasquez, Camille M.	Irvine	US	Partner
Wallach, Tia C.	Boston	US	Partner
Wasserman, Steven F.	New York	US	Partner
Weckstein, Kenneth B.	Washington, DC	US	Partner
Williams, Samuel P.	Boston	US	Partner
Willsey, Peter J.	Washington, DC	US	Partner
Winograd, Michael S.	New York	US	Partner
Wissner-Gross, Sigmund S.	New York	US	Partner
Wolkinson, Rachel O.	Washington, DC	US	Partner
York, Matthew P.	Boston	US	Partner

## Appendix

### Response to Item 5(g)

**Item 5(g): If the registrant is not an individual, furnish the following information: Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?**

Person	Foreign Principal(s)	Services
William R. Baldiga	Commonwealth/Government of The Bahamas	<p>Brown Rudnick has been engaged since March 2022 to provide legal services to the Commonwealth/Government of The Bahamas ("The Bahamas") unrelated to any registrable activities. In particular, we agreed to represent The Bahamas in connection with the development of a country policy position statement regarding digital assets. (Please note that our engagement letter for this representation has not been provided because it only describes non-registrable activities and contains privileged and confidential information regarding specific steps and strategies to be used in connection with developing a high-level white paper reflecting the government's position on digital assets.)</p> <p>Recently, Brown Rudnick has been reengaged by The Bahamas following the high-profile collapse of FTX Digital Markets Ltd. ("FTX") for services which come within the legal representation exemption. (Again, please note that our engagement letter is not provided because it does not involve registrable activities.) Given the significant attention by the U.S. government and media surrounding the collapse of FTX, Brown Rudnick anticipates that it may perform additional activities, which fall outside of the legal exemption, that require Brown Rudnick to communicate on behalf of The Bahamas with media outlets in the U.S. and/or U.S. government agencies and/or participate in meetings with representatives of the U.S. media and/or U.S. government agencies to discuss The Bahamas' activities and bona fides. Brown Rudnick anticipates that it may also contribute to written materials taking a position on the same, may share such materials through its website or social media, or may comment to the U.S. media on such materials. Accordingly, we have entered into another engagement letter dated December 6, 2022, attached hereto, that was agreed upon by The Bahamas on December 19, 2022. Note that we have yet to begin providing services under this agreement.</p>

Person	Foreign Principal(s)	Services
Stephen A. Best	Commonwealth/Government of The Bahamas	<p>Brown Rudnick has been engaged since March 2022 to provide legal services to the Commonwealth/Government of The Bahamas ("The Bahamas") unrelated to any registrable activities. In particular, we agreed to represent The Bahamas in connection with the development of a country policy position statement regarding digital assets. (Please note that our engagement letter for this representation has not been provided because it only describes non-registrable activities and contains privileged and confidential information regarding specific steps and strategies to be used in connection with developing a high-level white paper reflecting the government's position on digital assets.)</p> <p>Recently, Brown Rudnick has been reengaged by The Bahamas following the high-profile collapse of FTX Digital Markets Ltd. ("FTX") for services which come within the legal representation exemption. (Again, please note that our engagement letter is not provided because it does not involve registrable activities.) Given the significant attention by the U.S. government and media surrounding the collapse of FTX, Brown Rudnick anticipates that it may perform additional activities, which fall outside of the legal exemption, that require Brown Rudnick to communicate on behalf of The Bahamas with media outlets in the U.S. and/or U.S. government agencies and/or participate in meetings with representatives of the U.S. media and/or U.S. government agencies to discuss The Bahamas' activities and bona fides. Brown Rudnick anticipates that it may also contribute to written materials taking a position on the same, may share such materials through its website or social media, or may comment to the U.S. media on such materials. Accordingly, we have entered into another engagement letter dated December 6, 2022, attached hereto, that was agreed upon by The Bahamas on December 19, 2022. Note that we have yet to begin providing services under this agreement.</p>



Person	Foreign Principal(s)	Services
Clara Krivoy	Commonwealth/Government of The Bahamas	<p>Clara Krivoy is the partner managing this representation.</p> <p>Brown Rudnick has been engaged since March 2022 to provide legal services to the Commonwealth/Government of The Bahamas ("The Bahamas") unrelated to any registrable activities. In particular, we agreed to represent The Bahamas in connection with the development of a country policy position statement regarding digital assets. (Please note that our engagement letter for this representation has not been provided because it only describes non-registrable activities and contains privileged and confidential information regarding specific steps and strategies to be used in connection with developing a high-level white paper reflecting the government's position on digital assets.)</p> <p>Recently, Brown Rudnick has been reengaged by The Bahamas following the high-profile collapse of FTX Digital Markets Ltd. ("FTX") for services which come within the legal representation exemption. (Again, please note that our engagement letter is not provided because it does not involve registrable activities.) Given the significant attention by the U.S. government and media surrounding the collapse of FTX, Brown Rudnick anticipates that it may perform additional activities, which fall outside of the legal exemption, that require Brown Rudnick to communicate on behalf of The Bahamas with media outlets in the U.S. and/or U.S. government agencies and/or participate in meetings with representatives of the U.S. media and/or U.S. government agencies to discuss The Bahamas' activities and bona fides. Brown Rudnick anticipates that it may also contribute to written materials taking a position on the same, may share such materials through its website or social media, or may comment to the U.S. media on such materials. Accordingly, we have entered into another engagement letter dated December 6, 2022, attached hereto, that was agreed upon by The Bahamas on December 19, 2022. Note that we have yet to begin providing services under this agreement.</p>



Person	Foreign Principal(s)	Services
Julia V. Bennett	Commonwealth/Government of The Bahamas	<p>Brown Rudnick has been engaged since March 2022 to provide legal services to the Commonwealth/Government of The Bahamas ("The Bahamas") unrelated to any registrable activities. In particular, we agreed to represent The Bahamas in connection with the development of a country policy position statement regarding digital assets. (Please note that our engagement letter for this representation has not been provided because it only describes non-registrable activities and contains privileged and confidential information regarding specific steps and strategies to be used in connection with developing a high-level white paper reflecting the government's position on digital assets.)</p> <p>Recently, Brown Rudnick has been reengaged by The Bahamas following the high-profile collapse of FTX Digital Markets Ltd. ("FTX") for services which come within the legal representation exemption. (Again, please note that our engagement letter is not provided because it does not involve registrable activities.) Given the significant attention by the U.S. government and media surrounding the collapse of FTX, Brown Rudnick anticipates that it may perform additional activities, which fall outside of the legal exemption, that require Brown Rudnick to communicate on behalf of The Bahamas with media outlets in the U.S. and/or U.S. government agencies and/or participate in meetings with representatives of the U.S. media and/or U.S. government agencies to discuss The Bahamas' activities and bona fides. Brown Rudnick anticipates that it may also contribute to written materials taking a position on the same, may share such materials through its website or social media, or may comment to the U.S. media on such materials. Accordingly, we have entered into another engagement letter dated December 6, 2022, attached hereto, that was agreed upon by The Bahamas on December 19, 2022. Note that we have yet to begin providing services under this agreement.</p>

## Appendix

### Response to Item 6

**Item 6: List all individuals, other than those listed in Item 5(g), who render services or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical, secretarial, or in a related or similar capacity.**

Name	Residence Address	Foreign Principal(s)	Nature of Services
Stephen Clark	13 Glenview Dr. West Orange, NJ 07052	Commonwealth/Government of The Bahamas	<p>Brown Rudnick has been engaged since March 2022 to provide legal services to the Commonwealth/Government of The Bahamas ("The Bahamas") unrelated to any registrable activities. In particular, we agreed to represent The Bahamas in connection with the development of a country policy position statement regarding digital assets. (Please note that our engagement letter for this representation has not been provided because it only describes non-registrable activities and contains privileged and confidential information regarding specific steps and strategies to be used in connection with developing a high-level white paper reflecting the government's position on digital assets.)</p> <p>Recently, Brown Rudnick has been reengaged by The Bahamas following the high-profile collapse of FTX Digital Markets Ltd. ("FTX") for services which come within the legal representation exemption. (Again, please note that our engagement letter is not provided because it does not involve registrable activities.) Given the significant attention by the U.S. government and media surrounding the collapse of FTX, Brown Rudnick anticipates that it may perform additional activities, which fall outside of the legal exemption, that require Brown Rudnick to communicate on behalf of The Bahamas with media outlets in the U.S. and/or U.S. government agencies and/or participate in meetings with representatives of the U.S. media and/or U.S. government agencies to discuss The Bahamas' activities and bona fides. Brown Rudnick anticipates that it may also contribute to written materials taking a position on the same, may share such materials through its website or social media, or may comment to the U.S. media on such materials. Accordingly, we have entered into another engagement letter dated December 6, 2022, attached hereto, that was agreed upon by The Bahamas on December 19, 2022. Note that we have yet to begin providing services under this agreement.</p>

## Appendix

### Response to Item 10(a)

**Item 10(a): DISBURSEMENTS-MONIES:** During the period beginning 60 days prior to the date of the registrant's obligation to register under FARA, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Item 7 of this statement or transmitted monies to any such foreign principal? If yes, set forth below in the required detail and separately for each such foreign principal named including monies transmitted, if any, to each foreign principal.

Foreign Principal	Date	To Whom	Purpose	Amount	Subtotal
Commonwealth/Governm ent of The Bahamas	11/15/2022- 12/15/2022	Internal	In connection with the non-political activities that the Registrant has described above, the Registrant has expended money on various administrative tasks, including, for example, printing, research fees, and travel over the last 60 days.	\$ 30,801.50	
Commonwealth/Governm ent of The Bahamas	-----	-----	-----	----->	\$ 30,801.50